

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

QUINCY BLAKLEY & KIMBERLY
JOHNSON

v.

GOLABS, INC., TAO MOTORS, INC.
LONGMAN ZHAO, & QUIONG LI

§
§
§
Plaintiffs, §
§
§
§
§
§
Defendants. §

CIVIL ACTION NO: 3:21-cv-2422

NOTICE OF REMOVAL

COME NOW Defendants Golabs, Inc., Tao Motors, Inc., Longman Zhao and Quiong Li, and pursuant to 28 U.S.C. §§ 1331 and 1441, file their Notice of Removal of this action from the 193rd Judicial District Court of Dallas County, Texas to the United States District Court for the Northern District of Texas, Dallas Division, the Court for the district and division encompassing the place where the lawsuit is currently pending. In support thereof, Defendants respectfully show the Court as follows.

1. On August 27, 2021, Plaintiffs Quincy Blakley and Kimberly Johnson filed Plaintiff's (sic) Petition (the "Complaint") in the 193rd Judicial District Court for Dallas County, Texas, styled *Quincy Blakley & Kimberly Johnson v. Golabs, Inc., Tao Motors, Inc., Longman Zhao and Quiong Li*, where it was assigned Cause No. DC-21-11752.
2. True and correct copies of the state court docket sheet and all court process, pleadings, and the orders served upon Defendants in the state court action are being filed with this notice as required by 28 U.S.C. § 1446(a), and attached hereto as Exhibit A.

3. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Defendants pursuant to the provisions of 28 U.S.C. § 1441, because it alleges one or more federal questions under the Federal Labor Standards Act (FLSA), 29 U.S.C. §§ 201-209, the Federal Medical Leave Act Violation (FMLA), 29 U.C.S. § 2615, and the Americans with Disabilities Act (ADA), 42 U.S.C. § 12111 et seq. (Complaint ¶¶ 7-8, 40, 52-53, 59, and 67).

4. The first date upon which one or more of the Defendants were served with a copy of the Complaint and summons was September 9, 2021. Therefore, Defendants timely file this Notice of Removal within thirty (30) days after service of the Summons and Complaint. 28 U.S.C. §1446(b)(1); *Murphy Bros. v. Michetti Pipe Stringing, Inc.*, 526 U.S. 344, 354 (1999) (holding that the 30-day deadline to remove begins on the date the summons or citation is served even if the complaint is received at a prior date).

5. A true copy of this Notice of Removal will be filed with the Clerk of the District Court of the 193rd Judicial District for Dallas County, Texas, as required by law. A copy of the Notice of Filing of Notice of Removal is attached hereto as Exhibit B.

6. Defendants are also filing contemporaneously with this Notice a civil cover sheet, a supplemental civil cover sheet, and a separately signed certificate of interested persons and disclosure statement.

7. All Defendants join in and consent to the removal of this action.

WHEREFORE, Defendants pray that the above-described action now pending in the 193rd Judicial District Court of Dallas County, Texas be removed to this Court.

Respectfully submitted,

/s/ William Chu
William Chu
Texas State Bar No. 04241000
The Law Offices of William Chu
4455 LBJ Freeway, Suite 1008
Dallas, Texas 75244
Tel. (972) 392-9888
Fax. (972) 392-9889
Email: wmchulaw@aol.com
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that on October 1, 2021, a true and correct copy of the foregoing Notice of Removal has been furnished to Plaintiffs' counsel of record via electronic mail in accordance with the Federal Rules of Civil Procedure.

Vincent J. Bhatti and Ditty S. Bhatti
The Bhatti Law Firm, PLLC.
5700 Tennyson Parkway, Suite 300
Plano, TX 75024
Telephone: (214) 253-2533
Facsimile: (214) 279-0033
Vincent.bhatti@bhattilawfirm.com
Ditty.bhatti@bhattilawfirm.com

/s/ William Chu
William Chu